

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CRIMINAL NO. 6:11-CR-60097-HO
v.)	
)	
CODY SETH CRAWFORD,)	
)	
)	
Defendant.)	
)	

GOVERNMENT'S MOTION TO CONTINUE DETENTION HEARING

COMES NOW the United States of America, by S. Amanda Marshall, United States Attorney for the District of Oregon, through William E. Fitzgerald, Assistant United States Attorney, and by Thomas E. Perez, Assistant Attorney General for the Civil Rights Division of the U.S. Department of Justice, through Fara Gold, prosecutor for the Civil Rights Division, and moves this Court to continue the date of the Detention Hearing now set for June 4, 2012.

On August 24, 2011, a federal grand jury issued a two-count indictment charging the defendant with Damage to Religious Property and Use of Fire to Commit a Felony. This matter was set for a Detention Hearing on May 29, 2012. This Court bifurcated that hearing and set the remaining of the hearing for June 4, 2012.

The Undersigned, Fara Gold, is scheduled to travel to the Eastern District of Oklahoma on June 4, 2012, for an ongoing investigation until June 14, 2012. Therefore, the United States requests that the remainder of the detention hearing be continued until June 15, 2012, or thereafter. Although this is an eleven-day delay, it is not unreasonable considering that the

defendant has been in custody since August, 2012. Additionally, the United States is requesting this additional time so that both prosecutors of record can have the opportunity to appear. While the United States is not seeking additional time to hire its own expert, it would like the opportunity to fully cross-examine Dr. Gary Mesibov, the defense expert, as the United States has not stipulated to the admissibility of Dr. Mesibov's report.

The Undersigned, Fara Gold, has conferred with defense counsel, Bryan Lessley, who opposes this motion, both because of the length of time requested and because his investigator will be unavailable from June 15 through June 22, 2012.

WHEREFORE, having filed this Motion to Continue the Detention Hearing, the United States respectfully moves the Court to grant this motion to allow the Undersigned prosecutors to be present and adequately represent the interests of the people of the United States.

Respectfully submitted:

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/s/ Fara Gold
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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2012, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following:

Bryan Lessley, Attorney for the Defendant

/s/ Fara Gold

Fara Gold

Trial Attorney

U.S. Department of Justice

Civil Rights Division, Criminal Section